

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
TERRE HAUTE DIVISION

FILED

09/06/2022

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Roger A.G. Sharpe, Clerk

TERRANCE ALDEN,
Plaintiff,

v

CAUSE NO. 2:20-CV-00479-JPH-DLP

FEDERAL BUREAU OF PRISONS,
UNITED STATES,
Defendants.

PLAINTIFF'S RULE 26 (a)(1) INITIAL DISCLOSURES

NOW COMES, the Plaintiff, Terrance Alden ("Alden"), moving in the action before this Honorable Court, and the UNITED STATES ATTORNEY, in prose.

Alden respectfully submits this filing is intended to be in conformance with the Honorable Court's order directing filing of Rule 26 (a)(1) disclosures in accord with Fed. R. Civ. P.

Alden respectfully states, that these document(s) address method of contact with various witnesses, by means of contact through counsel at the United States Attorney's office, 10 West Market St. Suite 2100, Indianapolis, IN. 46204

Alden humbly avers that no other option is available to Establish [lawful] contact. Alden's specific intent is to be in actual full compliance with the Honorable Court's order.

A. WITNESSES

1. Plaintiff, Terrance Alden

2. Dr. William E. Wilson, M.D./C.D., Federal Bureau of Prisons
Dr. Wilson may be contacted through Counsel at the U.S. Attorney's Office, 10 West Market Street, Suite 2100, Indianapolis, IN. 46204.
(317) 226-6333.

Alden respectfully suggests in regard to information which Dr. Wilson, was provided by means of (9) NINE E-mails, from (9/18/18 through 11/25/19) advanced by Alden. The messages explicitly identify SEVERE PAIN, caused by (5/11/18), Shoulder injury, Prolonged Sleep deprivation, PTSD, violent panic attacks, and the recurrent lower leg infections. Notably this would be information Dr. Wilson, may have comment on.

Alden deferentially submits in accordance with provisions of FED. R. CIV. P. 10 (c), the information provided within the E-mails should be incorporated into original complaint. The E-mails were lost with all of records lost on JAN. 2, 2020, at U.S.P. Terre Haute.

3. Dr. David Lukens, Staff Physician, Federal Bureau of Prisons

Dr Lukens may be contacted through counsel at the U.S. Attorney's Office, 10 West Market St. Suite 2100, Indianapolis, IN. 46204
(317) 226-6333

Dr Lukens may have information regarding the allegations in the Complaint, including Plaintiff's medical conditions and the medical treatment Plaintiff received. Notably on 6/15/18, Dr Lukens, was provided notice to alert him to an "excessive risk to the prisoner's health and safety." The prisoner being Aiden

4. PA Genevieve Muscatell, Federal Bureau of Prisons (former)

PA Muscatell may be contacted through counsel at the U.S. Attorney's Office, 10 West Market St. Suite 2100, Indianapolis, IN. 46204
(317) 226-6333

PA Muscatell may have information regarding the allegations in the Complaint, including Plaintiff's medical conditions and the medical treatment Plaintiff received. Notable on 7/10/17, [Co-sign Required: YES] @ H-6 Exhibit Requested to be co-signed by Wilson, William E. M.D./C.D.
"the communication, in its content and manner of transmission"
"provided notice to alert him to an excessive risk to prisoner health and safety"
"Aiden's Medical Record for that day"

5. PA Mata, FEDERAL BUREAU OF PRISONS (FORMER)

PA Mata may be contacted through counsel at the U.S. Attorney's Office, 10 West Market St. Suite 2100, INDIANAPOLIS, IN. 46204

PA Mata may have information regarding the allegations in the complaint, including Plaintiff's medical conditions and medical treatment Plaintiff received.

6. RN KELLY KELLER, FEDERAL BUREAU OF PRISONS

RN KELLER may be contacted through counsel at the U.S. Attorney's Office, 10 West Market St. Suite 2100, INDIANAPOLIS, IN. 46204

RN KELLER may have information regarding the allegations in the complaint, including Plaintiff's medical conditions and the medical treatment Plaintiff received.

7. DR. JACQUELINE BLESSINGER, FEDERAL BUREAU OF PRISONS (FORMER)

Dr Blessinger, may be contacted through counsel at the U.S. Attorney's Office, 10 West Market St. Suite 2100, INDIANAPOLIS, IN. (46204)
(317) 226-6836.

Dr Blessinger may have information regarding the allegations in the complaint, including Plaintiff's Psychological conditions and treatment.

8. J. DAVIS, UNIT TEAM, FEDERAL BUREAU OF PRISONS

J. DAVIS, may be contacted through counsel at the U.S. Attorney's Office, 10 West Market St. Suite 2100, Indianapolis, IN. 46204
(317) 226-6333

J. DAVIS, may have information regarding "Rehabilitation Act claim," and "the causal connection between disability and Plaintiff's ineligibility."

9. A. Payne, UNIT TEAM, FEDERAL BUREAU OF PRISONS

A. Payne may be contacted through counsel at the U.S. Attorney's Office, 10 West Market St. Suite 2100, Indianapolis, IN. 46204
(317) 226-6333

A. Payne may have information regarding "Rehabilitation Act claim," and "the causal connection between disability and Plaintiff's ineligibility."

10. D. Holmes, UNIT TEAM, FEDERAL BUREAU OF PRISONS

D. Holmes, may be contacted through counsel at the U.S. Attorney's Office, 10 West Market St. Suite 2100, Indianapolis, IN. 46204
(317) 226-6333

D. Holmes, may have information regarding "Rehabilitation Act claim," and "the causal connection between disability and Plaintiff's ineligibility."

11. A. French, Unit Team, Federal Bureau of Prisons

A. French, may be contacted through counsel at the U.S. Attorney's Office, 10 West Market St. Suite 2100, Indianapolis, IN. 46204

A. French, may have information regarding "Rehabilitation Act claim," and "the causal connection between disability and Plaintiff's ineligibility."

12. Attorney Lisa Greenman, Office of Federal Public Defender, District of Maryland, Northern Division, Tower II Suite 1000, 100 South Charles St. Baltimore, Maryland 21201-2705.

Attorney Greenman, may have information in relation to the specific action taken on behalf of Palestinian, ZHEED Safarini, who was ordered to move into cell 216 upper, by A. French. Attorney Greenman, made contact with Office of Inspector General, regarding housing Safarini in cell with prisoner Alden # 02595-135, who had been investigated for the strangulation murder of Muslim R. Rodd, in Lewisburg, 1993.

Safarini was immediately moved out of Alden's cell on that day of Greenman's contact with O.I.G.

13. DR. Douglas H. Paine, EMG NEUROLOGY CONSULTATION

DR. Paine, may be contacted through counsel at the U.S. Attorney's Office, 10 West Market St. Suite 2100, INDIANAPOLIS, IN. 46204 (317) 226-6333

DR Paine, May have information related to actual injuries as defined by EMG results and effects of acute DENERVATION in Supra Spinalis.

14. DR Sami Jaafar, Orthopedic M.D.

DR Jaafar, May be contact through counsel at the U.S. Attorney's Office, 10 West Market St. Suite 2100, INDIANAPOLIS, IN. 46204 (317) 226-6333

DR Jaafar, may have information related to NERVE IMPINGEMENT tingling that shoots thru right arm pit and down arm, and the effects of LHERMITTE'S PHENOMENON

15. Aiden deferentially submits in accordance with provisions of FED. R. CIV. P. 26 (a)(1), Aiden does not recall NAMES of two Staff Psychologists, both of whom did have several periods of consultation with Aiden.

The first would be at FCI Yazoo City, Mississippi between Feb. 2010 and July 2010.

The second would be at Federal Medical Center, at Springfield, Mo. between Dec. 2015 and Oct. 2016.

16. Alden respectfully offers witness Brian Witham, # 43039-054 former cell-partner at USP Terre Haute, within weeks of (5/11/18), injuries testimony limited to Alden's actual methods of contending with prolonged sleep deprivation. Further, affidavit presenting observations of Witham while housed in cell 209 of F-1.

Alden humbly attests, in the matter of initial discovery (Exhibits) the Office of U.S. Attorney, has in fact provided copies of many Exhibits, which had been lost, to Alden, with the Jan. 02, 2020, confiscation of all of Alden's legal files.

By example, three (3) Form 95 tort claims filed - 2005/2006 by former cell-partners detailing instantaneous injuries received stemming from frenzied panic episodes endured by Alden. As well as at least two affidavits related to above claims.

There will be approximately (10) ten E-mails to Dr. Wilson, focusing on injuries resultant of sleep deprivation... (By Alden)

Alden respectfully declares the items identified on this page will be filed with Office of U.S. Attorney, once Alden, is able to make a copy for retention in files.